

CLARK HILL PLLC  
PAOLA M. ARMENI  
Nevada Bar No. 8357  
Email: [parmeni@clarkhill.com](mailto:parmeni@clarkhill.com)  
GIA N. MARINA  
Nevada Bar No. 15276  
Email: [gmarina@clarkhill.com](mailto:gmarina@clarkhill.com)  
1700 South Pavilion Center Drive, Suite 500  
Las Vegas, Nevada 89135  
Tel: (702) 862-8300

Attorneys for Defendant, Michele Fiore

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MICHELE FIORE,

Defendant.

CASE NO. 2:24-cr-00155-JAD-DJA

**STIPULATION AND ORDER TO**  
**CONTINUE SENTENCING (THIRD**  
**REQUEST)**

**IT IS HEREBY STIPULATED** by and between Defendant, Michele Fiore, by and through her counsel, Paola M. Armeni, Esq. and Gia N. Marina of the law firm of Clark Hill PLLC and the Plaintiff, United States of America, by and through Sue Fahami Acting United States Attorney, Alexander Byrne Gottfried, and Dahoud Askar, that the currently scheduled sentencing hearing set for April 14, 2025, at 1:30 p.m., be vacated and continued to May 14, 2025, at 10:00 a.m., or to a date thereafter that is convenient for the Court.

This Stipulation is entered into for the following reasons:

1. Lead counsel, Paola M. Armeni, Esq., started trial on March 24, 2025, in the case captioned *United States of America v. Eduardo Ruben Lopez*, Case No. 2:23-CR-00055-CDS-DJA. This trial is expected to last three-weeks, through April 11, 2025.

2. The current deadline to file Ms. Fiore's Sentencing Memorandum and Objections to the Presentence Investigation Report is April 9, 2025. Counsel for Ms. Fiore will still be in the above-referenced trial on this date.

1 3. The request to continue is so that counsel for Ms. Fiore has adequate time to prepare  
2 sentencing documents and prepare for sentencing in order to effectively represent her client.

3 4. Ms. Fiore has appeared in this case, and is in not custody and, along with the government,  
4 agrees to this continuance.

5 5. The additional time requested herein is not sought for purposes of delay and the denial of  
6 this request for a continuance could result in a miscarriage of justice.

7 6. Federal Rule of Criminal Procedure 32(b)(2) permits this Court to continue a sentencing  
8 hearing for good cause. Good cause exists in this case.

9 7. For all the above-stated reasons, the ends of justice would be best served by a continuance  
10 of the sentencing hearing.

11 8. This is the third request for a continuance of the sentencing hearing.

12 Matthew Galeotti,  
13 Supervisory Official,  
14 Criminal Division  
U.S. Department of Justice

CLARK HILL PLLC

15 DATED this 1<sup>st</sup> day of April, 2025.

DATED this 28<sup>th</sup> day of March, 2025.

16 /s/ Alexandre B. Gottfried  
ALEXANDER BYRNE GOTTFRIED  
17 DAHOUD ASKAR  
Attorney for Plaintiff,  
18 UNITED STATES OF AMERICA

/s/ Paola M. Armeni  
PAOLA M. ARMENI  
GIA N. MARINA  
Attorneys for Defendant,  
MICHELE FIORE

1 UNITED STATES DISTRICT COURT  
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

CASE NO. 2:24-cr-00155-JAD-DJA

4 Plaintiff,

5 vs.

6 MICHELE FIORE,

**FINDINGS OF FACT, CONCLUSION OF  
LAW AND ORDER**

7 Defendant.  
8

9 Based on the pending Stipulation of counsel, and good cause appearing therefore, the  
10 Court hereby finds that:

11 **CONCLUSIONS OF LAW**

12 Based on the fact that counsel has agreed to a continuance, the Court hereby concludes  
13 that:

14 1. Lead counsel, Paola M. Armeni, Esq., started trial on March 24, 2025, in the case captioned  
15 *United States of America v. Eduardo Ruben Lopez*, Case No. 2:23-CR-00055-CDS-DJA. This trial  
16 is expected to last three-weeks, through April 11, 2025.

17 2. The current deadline to file Ms. Fiore's sentencing memorandum and objections to the  
18 Presentence Investigation Report is April 9, 2025. Counsel for Ms. Fiore will still be in the above-  
19 referenced trial on this date.

20 3. The request to continue is so that counsel for Ms. Fiore has adequate time to prepare  
21 sentencing documents and prepare for sentencing in order to effectively represent her client.

22 4. Ms. Fiore has appeared in this case, and is in not custody and, along with the government,  
23 agrees to this continuance.

24 5. The additional time requested herein is not sought for purposes of delay and the denial of  
25 this request for a continuance could result in a miscarriage of justice.

26 6. Federal Rule of Criminal Procedure 32(b)(2) permits this Court to continue a sentencing  
27 hearing for good cause. Good cause exists in this case.  
28

